

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS EASTERN  
DIVISION

SABA HASHEM, Individually and	}	
Derivatively on behalf of	}	
D'ANGELO & HASHEM, LLC	}	CIVIL ACTION NO:
Plaintiffs	}	1:16-cv-12383-IT
	}	
v.	}	
	}	
STEPHEN L. D'ANGELO	}	
D'ANGELO LAW GROUP, LLC, and	}	
Nominally, D'ANGELO & HASHEM, LLC	}	
Defendants	}	
	}	

**EXPEDITED, ASSENTED-TO MOTION**  
**TO EXTEND THE DATE BY WHICH TO CONDUCT DEPOSITION**  
**OF THE PLAINTIFF, SABA HASHEM**

NOW COME the Defendants, Stephen L. D'Angelo, D'Angelo Law Group, LLC and nominally D'Angelo & Hashem, LLC, by and through their attorneys, BRAUCHER & AMANN, PLLC and with the assent of the Plaintiff and the Intervenor in this case, hereby move this Court to enter an Order further extending the date by which the deposition of Saba Hashem must be conducted.

The parties have been engaged in many depositions in this case in over the last few weeks in order to meet the August 3, 2018 discovery deadline.

Due to the multiple parties involved, conflicting attorney and staff schedules, the parties are unable to complete Mr. Hashem's deposition by the August 3, 2018 deadline imposed by this Court (See Docket Entry 111).

Defense Counsel is able to depose Mr. Hashem tomorrow afternoon. However, other counsel in this case are not available tomorrow.

Attorney Farrah graciously offered to make Mr. Hashem available for deposition (for up to 3.5 hours) within the first two (2) weeks of August. Attorney Farrah also indicated today that he will advise the undersigned of Mr. Hashem's exact date and time availability by the evening of Monday, August 6, 2018.

Attorney Bujosa assents to this motion and also advised me today in person at her office that an agreement has been made by and between her and the Attorney for Ms. Ashley Hiam, to depose her on August 21, 2018 at 10:00 A.M. at Attorney Bujosa's office in Charlestown, Massachusetts. The undersigned does not oppose that

As required by L.R. 7.1(a)(2), undersigned counsel and co-counsel conferred with opposing counsels with respect to the issue raised in this Motion. Counsel to the Plaintiff and counsel to the Interpleader each provided assent indicating that their clients assent to this Motion.

In support hereof, the Parties request:

A. That the deposition of Saba Hashem will take place, by agreement of the Parties, no later than August 17, 2018.

B. Grant any other relief which this Court deems Mete and Just.

**WHEREFORE,** for the reasons stated above, the Defendants respectfully request that this Court enter an Order further extending the deadline for the Plaintiff, Saba Hashem's deposition to be conducted on a date before August 17, 2018.

Respectfully submitted,  
Defendants,  
By and through their attorneys,

Dated: August 2, 2018

/s/ William J. Amann, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on the date indicated below, a copy of the foregoing document was served by the Court's ECF system to all parties who have requested such notice.

Dated: August 2, 2018

/s/ William J. Amann, Esq.  
William J. Amann, Esq

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